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January 19, 2017

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Fixed Wireless Communications Coalition, Inc., Request for Modified Coordination
Procedures in Bands Shared Between the Fixed Service and the Fixed Satellite
Service, RM-11778**

Dear Ms. Dortch:

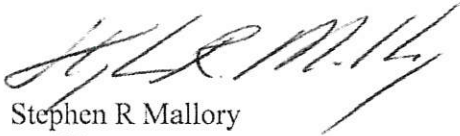
Pacific Satellite Connection, Inc. respectfully submits this reply in opposition to the Petition for Rulemaking ("Petition") filed by Fixed Wireless Communications Coalition, Inc. ("FWCC") in the above-captioned proceeding.ⁱ Pacific Satellite Connection, Inc. fully supports the satellite industry's opposition to the rule changes proposed by the FWCC.ⁱⁱ In particular, Pacific Satellite Connection, Inc. agrees with Intelsat that adopting FWCC's radical proposal to eliminate the Commission's long-standing and highly successful full-band, full-arc earth station licensing policy would critically harm the Fixed-Satellite Service ("FSS") customers that this flexible policy was designed to protect. As explained below, Pacific Satellite Connection, Inc. is such a customer. Accordingly, Pacific Satellite Connection, Inc. respectfully requests that the Commission deny or dismiss FWCC's Petition.

Pacific Satellite Connection, Inc. owns a fleet of satellite trucks used for news, sports and corporate clients. They operate inside a booking schedule whereby their needs for C-Band capacity are on an occasional use basis. Often times they transmit from venues, particularly sports venues where available C-Band frequencies are limited. Without the full spectrum of available frequencies at their disposal, events such as the Super Bowl could be compromised for the broadcaster.

The Commission's existing full-band, full-arc earth station licensing policy is critically important for Pacific Satellite Connection, Inc.'s occasional use, short-term transportable satellite operations. In some cases, the event venue at which Pacific Satellite Connection, Inc. will provide satellite services is unknown until a few days prior to the event. Thus, Pacific Satellite Connection, Inc. is often required to coordinate frequencies with spectrum coordinators on extremely short notice. The precise C-band frequencies and satellites on which Pacific Satellite Connection, Inc. operates for any given event depend on both the frequencies available at the particular location and the satellite capacity to which Pacific Satellite Connection, Inc. has access on an occasional use basis. FWCC's proposal would no longer allow for full-frequency, full-arc licenses and would, absent a waiver, require Pacific Satellite Connection, Inc. to file a license

modification application or request for special temporary prior to transmitting on any frequency or to a satellite in any orbital location not explicitly provided in the applicable license. Because the very nature of occasional use, short-term satellite operations requires that FSS customers have the flexibility to coordinate their operational parameters on extremely short notice, the rigid licensing regime proposed by FWCC in its Petition would render these services all but impossible. Accordingly, Pacific Satellite Connection, Inc. respectfully requests that the Commission deny or dismiss FWCC's Petition.

Sincerely,



Stephen R Mallory
President
Pacific Satellite Connection, Inc.

ⁱ Fixed Wireless Communications Coalition, Inc., Request for Modified Coordination Procedures in Bands Shared Between the Fixed Service and the Fixed Satellite Service, RM-11778 (filed Oct. 11, 2016).

ⁱⁱ See, e.g., Opposition of Intelsat License LLC, RM-11778 (filed Jan. 9, 2017); Petition to Dismiss or Deny of the Satellite Industry Association, RM-11778 (filed Jan. 9, 2017); Petition to Dismiss or Deny of SES Americom, Inc. (filed Jan. 9, 2017); Opposition of EchoStar Satellite Operating Corporation and Hughes Network Systems, LLC, RM-11778 (filed Jan. 9, 2017).

CERTIFICATE OF SERVICE

I, Derrick Johnson, hereby certify that on this 19th day of January, 2017, I caused a true and correct copy of the foregoing to be served by first-class mail, postage prepaid, on:

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